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May 28, 2019

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141

Dear Ms. Dortch:

Attached is the Redacted version of the Reply Comments of Verizon ("Reply Comments") in the above-captioned matter. Verizon is filing the Highly Confidential version of these Reply Comments under separate cover.

Thank you for your assistance in this matter. Please contact me at 202-326-7930 or eleo@kellogghansen.com if you have any questions.

Sincerely,

Evan T. Leo
Counsel for Verizon

Attachment

REDACTED – FOR PUBLIC INSPECTION

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks	WC Docket No. 18-141

REPLY COMMENTS OF VERIZON

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INTRODUCTION AND SUMMARY

The record establishes that unbundled network elements ("UNEs") are overwhelmingly used to serve business customers in urban areas, and not to serve consumers or customers in rural areas.[1] The record also shows that in almost all of the locations where UNEs are used, there already exist multiple competitive alternatives, including near-ubiquitous cable facilities.[2] Competitive facilities reach more than 92% of buildings with Business Data Services ("BDS") demand, more than 89% of census blocks with BDS demand, and at least 78% of incumbent local exchange carrier ("ILEC") central offices.[3]

Unable to dispute this evidence, some commenters urge the Commission either to ignore the BDS and other data or to reverse its recent decision to incorporate the BDS data into the record here. Other commenters rehash complaints about the BDS data that the Commission has previously rejected, or argue that the Commission should reject or undermine its prior conclusions based on assertions about a small number of locations.

But the Commission's statutory role in evaluating USTelecom's forbearance petition is to assess whether the unbundling and resale regulations at issue are still "necessary for the protection of consumers," 47 U.S.C. §160(a)(2), not whether these legacy rules help prop up

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[1] *See* pp. 3-6, *infra*.

[2] *See* AT&T Comments at 7-9, 13-15; CenturyLink Comments at 9-10; Frontier Comments at 2-4; Letter from Patrick R. Halley, Senior Vice President, Advocacy & Regulatory Affairs, USTelecom–The Broadband Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141, at 5-7, 10-11 (May 6, 2019) ("USTelecom May 6 Ex Parte"). Unless otherwise noted, "Comments" cited here refer to those filed on May 9, 2019, in WC Docket No. 18-141 and/or WC Docket No. 16-143.

[3] *See* Verizon Comments at 5-6; *Business Data Services in an Internet Protocol Environment*, Report and Order, 32 FCC Rcd 3459, ¶ 91 (2017) ("*BDS Order*").

individual competitors and business models that have relied on these rules in the past. Based on the record evidence, including the BDS data, the Commission should grant forbearance for transport UNEs, dark fiber UNEs, and digital UNE loops nationwide, or at a minimum in areas where facilities-based competition unquestionably exists. The Commission should also grant nationwide forbearance for analog DS0 loops and the Section 251(c)(4) resale requirements, which are used predominantly to provide voice services for which there is robust and ubiquitous competition from myriad sources.

I. THE RECORD SUPPORTS ELIMINATING TRANSPORT AND DARK FIBER UNES

The record supports USTelecom's request for nationwide forbearance from transport and dark fiber UNE regulations. At a minimum, the Commission should grant forbearance from these regulations in areas where competition unquestionably exists, as USTelecom has explained.[4]

First, as USTelecom notes, relief in all Tier 1 and Tier 2 wire centers is appropriate because each of these wire centers has been shown to contain a substantial concentration of business demand, significant facilities-based competition, or both.[5] As Verizon and others have shown, the Commission's prior conclusion in the BDS proceeding that ex ante pricing regulation for TDM transport should be eliminated due to "substantial competition" for these services also supports forbearance from transport UNEs.[6] The underlying facilities used to provide TDM

[4] *See* USTelecom May 6 Ex Parte at 8-12.

[5] *See id.* at 11 (citing 47 C.F.R. § 51.319(d)(3)).

[6] *See*, *e.g.*, Verizon Comments at 4-9; AT&T Comments at 5-10; CenturyLink Comments at 10-15; Frontier Comments at 1-4.

transport and transport UNEs are identical; both involve the same geographic and product markets; and in both cases the relevant inquiry is whether competition is sufficient to protect the ultimate end users of those services.[7]

Second, the record shows that virtually all UNEs are purchased in urban areas where BDS demand is heavily concentrated and competition is robust, and that there is extremely low usage of UNEs in rural areas.[8] In response to claims that competitors still need UNEs in rural areas,[9] Verizon examined the demand for UNEs sold in the rural and urban census blocks (as defined by the Census Bureau[10]) in Verizon's ILEC footprint. Verizon determined that competitive local exchange carriers ("CLECs") purchase UNEs in only about **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of the rural census blocks in its ILEC footprint, and that these census blocks account for less than **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of the total population

[7] *See* Verizon Comments at 5-8; AT&T Comments at 6-7; CenturyLink Comments at 11-12; Frontier Comments at 4. *See also* USTelecom May 6 Ex Parte at 10.

[8] *See* USTelecom Sept. 5, 2018 Reply Comments at 18; Ed Naef & Micah Sachs, CMA Strategy Consulting, *Assessing the Impact of Forbearance from 251(c)(3) on Consumers, Capital Investment, and Jobs – Reply to Comments* at 6-7 (Sept. 2018), *attached to* USTelecom Sept. 5, 2018 Reply Comments. *See also* CenturyLink Sept. 5, 2018 Reply Comments at 17-18 ("92 percent of UNEs are purchased within municipal boundaries, as compared to 69 percent and 83 percent of CenturyLink's retail residential and business lines, respectively").

[9] *See*, *e.g.*, INCOMPAS Comments at 6, 21, 24; Sprint Comments at 4, 6; Letter from John Nakahata & Henry Shi, Harris, Wiltshire & Grannis LLP, Counsel to INCOMPAS, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141, at 2 (Mar. 13, 2019) ("INCOMPAS Mar. 13, 2019 Ex Parte").

[10] *See* U.S. Census Bureau, *2018 TIGER/Line Shapefile Tabulation (Census) Block Files (TABBLOCK)*, *available at* https://www2.census.gov/geo/tiger/TIGER2018/TABBLOCK/ (2010 urban/rural designations); FCC, *Staff Block Estimates*, https://transition.fcc.gov/bureaus/wcb/cpd/us2017.csv.zip (2010 census population and households, as reported by Commission staff).

or households in rural areas and only about **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of the population or households in all census blocks where Verizon sells UNEs. These data therefore confirm that CLECs are overwhelmingly using UNEs in urban areas, and that eliminating transport UNEs will therefore neither meaningfully impact competition nor prevent competitive providers from obtaining access to ILEC facilities.[11]

In response, INCOMPAS provides limited anecdotal examples of rural areas where there is allegedly no alternative to the ILEC. But the nine declarations that INCOMPAS submitted from its member companies identify only 47 areas – primarily counties or portions of counties – where these parties claim that no alternative to the ILEC exists.[12] Concerns about a limited number of specific rural or remote locations may warrant targeted consideration, but such anecdotes don't substitute for reasoned data analysis or outweigh the masses of data about competition occurring elsewhere. Further, the fact that there may be a small number of areas where the ILEC is the only provider doesn't show that UNEs are necessary even in those areas.

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[11] *See* Verizon Comments at 9-12.

[12] *See* Allstream (Denney) First Supp. Decl. ¶ 5 (INCOMPAS Comments Att. 1) (alleging there are 7 rural counties in which there is no other competitive alternative); Biddeford Internet (Durdag) Decl. ¶¶ 4, 6 (INCOMPAS Comments Att. 2) (alleging there are no competitive alternatives in a town and city in Maine); Digital West (Buckingham) First Supp. Decl. ¶ 4 (INCOMPAS Comments Att. 4) (alleging there are no competitive alternatives in 14 communities); First Communications (Sollenberger) Decl. ¶ 5 (INCOMPAS Comments Att. 5) (alleging there are no competitive alternatives in four rural communities); Gorge Networks (Bubb) First Supp. Decl. ¶¶ 3-4 (INCOMPAS Comments Att. 6) (alleging there are no competitive alternatives in six communities); Socket Telecom (Kohly) First Supp. Decl. ¶¶ 6-8 (INCOMPAS Comments Att. 7) (alleging there are no competitive alternatives in parts of two counties); TelNet Worldwide (Iannuzzi) Decl. ¶¶ 4, 6 (INCOMPAS Comments Att. 8) (alleging there are no competitive alternatives in five cities and parts of six counties); Virginia Global (Janjic) First Supp. Decl. ¶ 5 (INCOMPAS Comments Att. 9) (alleging there are no competitive alternatives in one county).

Verizon and others have already committed to working with CLECs on their transition and to offering replacement or alternative services. For example, Verizon currently offers, and does not have plans to discontinue, alternatives to DS0 services such as Wholesale Advantage, Ethernet, and low-cost Ethernet.

Third, the record shows that UNEs are overwhelmingly used to serve business customers, not consumers. Opponents are therefore wrong to claim that the BDS data are irrelevant to the UNE inquiry here, on the mistaken ground that the BDS data relate solely to businesses whereas UNEs may be used to serve consumers.[13] In response to opponents' assertions,[14] Verizon analyzed where it sells UNEs today, and confirmed that nearly all are sold at business locations.[15] Specifically, we estimate that approximately **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of analog DS0 UNE circuits, approximately **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of digital DS0 UNE circuits, and approximately **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of DS1 and DS3 UNE circuits that Verizon sells are at locations we believe to be businesses. And our analysis is likely conservative.[16] In those areas where Verizon sells UNEs and there is broadband competition

[13] *See* INCOMPAS Comments at 17-18; U.S. TelePacific *et al.* Comments at 6-7.

[14] *See*, *e.g.*, Letter from Karen Reidy, Vice President, Regulatory, INCOMPAS, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141, at 1-2 (May 14, 2019); INCOMPAS Comments at 6; INCOMPAS Mar. 13, 2019 Ex Parte at 2.

[15] Verizon determined UNE circuit locations by geocoding each circuit's address. Verizon then queried each circuit's geocode against available databases – principally the Melissa database (https://www.melissa.com/) and the Factual database (https://www.factual.com/products/factual-places/) – to assess whether the circuit is at a business or residential location.

[16] *See id.*

from cable,[17] Verizon's analysis also shows that approximately **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of analog DS0 UNE circuits, approximately **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of digital DS0 UNE circuits, and approximately **[BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL]** of DS1 and DS3 UNE circuits that Verizon sells are at locations we believe to be businesses. Thus, these data show that UNEs are used to serve residential customers only on a very small or exceptional basis, and likely do not use DS1 and DS3 UNEs to serve residential customers at all.

Fourth, the record supports forbearance from dark fiber UNEs. The Commission's finding of "substantial competition" for transport in the *BDS Order* applies equally to dark fiber UNEs, because where competitive fiber has been deployed it can be used to support either lit or dark services.[18] Further, as we demonstrated, there is minimal use of dark fiber UNEs overall,[19] and the vast majority of that usage occurs in counties that the Commission deemed competitive

[17] Verizon relied on the Form 477 data as of December 31, 2017 submitted by USTelecom, where the maximum advertised downstream bandwidth available in a census block via cable facilities is greater than or equal to 25 Mbps. *See* Letters from Patrick R. Halley, Senior Vice President, Advocacy and Regulatory Affairs, USTelecom, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141 (May 6, 2019) (attaching eight text files with cable broadband deployment by census block).

[18] *See* Verizon Comments at 15-16; *Business Data Services in an Internet Protocol Environment*, Tariff Investigation Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 4723, ¶ 67 (2016).

[19] *See* Letter from Frederick E. Moacdieh, Executive Director – Federal Regulatory and Legal Affairs, Verizon to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141, at 2 (Sept. 24, 2018) ("Verizon Sept. 24, 2018 Ex Parte"); Letter from Curtis L. Groves, Associate General Counsel, Federal Regulatory and Legal Affairs, Verizon to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141, at 2 (July 20, 2018).

in the *BDS Order* and in which there are ample alternative services and arrangements to dark fiber UNEs.[20] CLECs also have many alternatives to dark fiber UNE transport.[21] And while Sonic claims (at 2) that those "competitive lit services are no substitute for dark fiber," the relevant inquiry is not whether other competitors are making available dark fiber to Sonic, but whether competition exists to give retail customers options and keep prices in check.[22]

INCOMPAS and other commenters urge the Commission to ignore the robust factual record that now exists, on the ground that they have not had time to review and analyze the BDS data and other newly available data.[23] But these arguments misapprehend the "complete when

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[20] *See* Verizon Comments at 16. Although INCOMPAS claims (at 20) that dark fiber is "critical" for "customers served by Tier 3, the most remote, wire centers," it provides negligible support for this claim, which contradicts the empirical data that Verizon and others have supplied. INCOMPAS cites declarations from a few of its members that merely contain vague assertions that dark fiber is "critical" or "needed," and even then only in very limited cases. *See* INCOMPAS Comments at 20 n.51 (citing Socket Telecom (Kohly) Decl. ¶ 36 (INCOMPAS Aug. 6, 2018 Comments Att. 15): "access to UNE loops, EELs, inter-office dark fiber is so critical"); *id*. (citing Sonic (Jasper) Decl. ¶ 7 (Sonic Aug. 6, 2018 Comments Att. A): "With these UNEs, Sonic has created a network connecting 195 central office wire centers in the San Francisco, Sacramento, and Los Angeles areas, 116 of which are classified as 'Tier 3' under the Commission's unbundling rules."); *id*. (citing IdeaTex (Friesen) Decl. ¶ 5 (INCOMPAS Aug. 6, 2018 Comments Att. 11): "One specific and powerful example of the use of UNE dark fiber transport is our deployment in Andale, Kansas."); *id.* (citing Digital West (Buckingham) Decl. ¶ 10 (INCOMPAS Aug. 6, 2018 Comments Att. 6): "Digital West is collocated in 8 central offices throughout our service area and 6 of those offices are linked with UNE dark fiber transport. The remaining small offices are connected with UNE DS-3 transport."); *id.* (citing Mammoth (Worthen) Decl. ¶¶ 9, 11 (INCOMPAS Aug. 6, 2018 Comments Att. 13): citing examples of 24 clients that Mammoth serves using dark fiber UNEs).

[21] *See* Verizon Sept. 24, 2018 Ex Parte at 2. For example, CLECs may lease commercial dark fiber or BDS transport (either TDM or IP-based) from third parties; they also may bond DS1 BDS transport to attain greater bandwidth and convert aggregated IP-based traffic to TDM by using widely available equipment that support this technical functionality.

[22] 47 U.S.C. § 160.

[23] *See* INCOMPAS Comments at 2, 8, 15-17; Sprint Comments at 7; *see also* California Public Utilities Commission Comments at 3-4; Sonic Comments at 2-3.

filed" rule, which explicitly permits the Commission to "consider further facts and arguments entered into the record" after the filing of a petition "by permission of the Commission."[24] Here, the Commission itself determined that it was appropriate to incorporate the BDS data,[25] which USTelecom referenced in its original petition,[26] but could not have incorporated on its own given the proprietary nature of these data. The Commission can and should also consider its most recent Form 477 data,[27] which, among other things, show that cable companies have deployed networks that entirely circumvent ILEC transport covering the vast majority of the country.[28] These are the Commission's own data, not "data or information in the possession of third parties," which the Commission's rules require a petitioner to identify in their petition.[29] In any event, it is permissible for the Commission to consider the most recent Form 477 data both because they were submitted "in response to facts and arguments introduced by commenters or

[24] 47 C.F.R. § 1.54(f)(2).

[25] Public Notice at 2, *Wireline Competition Bureau To Incorporate Business Data Services Data and Second Further Notice and Further Notice Record into USTelecom Forbearance Proceeding*, WC Docket Nos. 18-141, 7-144, 16-143, 05-25; RM-10593, DA 19-249 (rel. Apr. 3, 2019); Public Notice at 1, *Wireline Competition Bureau Seeks Focused Additional Comment in Business Data Services and USTelecom Forbearance Petition Proceedings and Reopens Secure Data Enclave*, WC Docket Nos. 18-141, 17-144, 16-143, 05-25; RM-10593, DA 19-281 (rel. Apr. 15, 2019).

[26] *See* Petition for Forbearance of USTelecom—The Broadband Association at 11-15, *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141 (filed May 4, 2018) ("Petition" or "USTelecom's Petition").

[27] A prior vintage of the Form 477 data were part of the record in the BDS proceeding that the Commission has already incorporated here. *See*, *e.g.*, *BDS Order* ¶¶ 105-107.

[28] *See* USTelecom May 6 Ex Parte at 10 (citing May 6 Economists Decl. at 4).

[29] *See* 47 C.F.R. § 1.54(b)(2).

opponents," and because the Commission has full discretion under its rules to consider "supplemental information" where appropriate.[30]

In addition to trying to block consideration of the BDS data and the most recent Form 477 data, INCOMPAS and Sprint argue these data should be ignored because they do not adequately capture the extent of competitive transport and the obstacles that competitive carriers face.[31] But these claims merely rehash the arguments these parties made during the BDS proceeding, which the Commission properly rejected.[32] These parties also failed to persuade the Eighth Circuit that the Commission's substantive conclusions were faulty.[33] Moreover, there are even more data to support the Commission's prior conclusions now than at the time of the BDS proceeding, including the Form 477 data showing that cable competition has continued to increase as the Commission predicted.[34] The Commission should therefore adopt the same

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[30] *See* 47 C.F.R. § 1.54(f).

[31] *See* INCOMPAS Comments at 3 ("The *April Data Tables* otherwise provide virtually no insight on the barriers to entry for competitive transport providers, or their likelihood of overcoming these barriers."); *id.* at 6-14; Sprint Comments at 3-6.

[32] *Compare*, *e.g.*, INCOMPAS Comments at 3-4, 7-9 (claiming "virtually no insight on the barriers to entry for competitive transport providers"), *with BDS Order* ¶¶ 79-82 (noting "[e]vidence of competitive providers investing in transport services" and "a competitive landscape where customers often combine competitive transport with channel terminations supplied by incumbents," and "observ[ing] responsive market conditions that support the deployment of competitive facilities"); *compare* INCOMPAS Comments at 10 (arguing that cable providers should be excluded from competitive providers with fiber within a half-mile), *with BDS Order* ¶ 119 (finding that "wireline providers of BDS are commonly willing to extend their existing network out approximately a half mile, and in some instances further, to meet demand. . . . This is true for cable companies who today are major and aggressive business data services suppliers").

[33] *Citizens Telecomms. Co. of Minn., LLC v. FCC*, 901 F.3d 991, 1008-1015 (8th Cir. 2018).

[34] *See*, *e.g.*, *BDS Order* ¶ 141 n.410 ("subsequent updates to the competitive market test will rely entirely on the presence of broadband-capable cable infrastructure as evidenced in our Form 477

conclusions with respect to transport UNEs as it did with respect to TDM transport in the *BDS Order*.

Finally, INCOMPAS argues that UNEs should be retained in areas with relatively low BDS demand because they allow competitive providers to build up the customer base that will ultimately allow them to deploy their own facilities.[35] But the goal of the Act is not to provide a specific type of competitor a "bridge" to deploy facilities, but to promote facilities-based competition generally. Thus, where, as here, there is near-ubiquitous competition from cable as well as other competitive deployment, there is no need for the Commission to take the extreme step INCOMPAS urges of ensuring CLECs "predictability as to their costs and revenues before incurring the risks of building out networks."[36]

II. THE RECORD SUPPORTS ELIMINATING THE OTHER UNBUNDLING AND RESALE OBLIGATIONS COVERED BY USTELECOM'S PETITION

The evidence presented herein also supports nationwide forbearance from the other regulatory obligations covered by USTelecom's petition, including the requirement to provide unbundled digital and analog loops and to provide resale services under Section 251(c)(4). Although the record amply supports nationwide forbearance, the Commission should at a minimum adopt the framework that USTelecom recently proposed.[37]

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data collection"); USTelecom May 6 Ex Parte at 5 (summarizing Form 477 data as of December 2017 and continued deployment of gigabit services by cable providers).

[35] *See* INCOMPAS Comments at 6.

[36] *See* INCOMPAS Comments at 22-23. INCOMPAS likewise acknowledges that in rural and remote areas "there is no case for building separate transport facilities since the purpose is not to transport higher bandwidth (and higher revenue) aggregated traffic." *Id.* at 21.

[37] *See* USTelecom May 6 Ex Parte at 3-8, 12-14.

Some commenters claim that eliminating UNE loops will reduce consumers' choice for broadband services.[38] But competition from cable – which reaches approximately 90% of households with speeds of at least 25 Mbps – renders unbundling unnecessary to ensure the availability of broadband services at competitive prices. And in rural areas where competitors claim cable sometimes does not reach, satellite services provide consumers with a broadband alternative.[39] In all cases, however, the Commission should, at a minimum, forbear from enforcing unbundling requirements for 251(c)(4) resale and analog DS0 loops on a nationwide basis and digital DS0, DS1 and DS3 loops in census blocks in counties it deemed competitive in its *BDS Order* or where cable providers offer service at speeds of at least 25 Mbps downstream and 3 Mbps upstream.

CONCLUSION

For the foregoing reasons, the Commission should grant forbearance from unbundling and Section 251(c)(4) resale obligations nationwide. At a minimum, the Commission should grant forbearance from these obligations consistent with the narrower framework that USTelecom has proposed.

[38] *See* INCOMPAS Comments at 6.

[39] *See* USTelecom May 6 Ex Parte at 6.

Respectfully submitted,

/s/ Evan T. Leo

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